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Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Docket 12-267

2016 RE: DA 16-367

Compliance response of proposed CID Section 25.281(b)

ELECTRONICALLY FILED VIA ECFS

To Whom It May Concern:

The Federal Communications Commission has announced plans to implement mandatory Carrier Identification (CID) specifically for temporary-fixed earth stations. In order to review this plan and for comments, The Director of International Bureau waived the CID requirements for one year beginning with the new start date, Sept. 3, 2017.

Implementation in its current form will force my company (a small business), to incur a tremendous cost that cannot be passed on to our customers.

The current proposal using new hardware requiring new equipment is ludicrous. We currently identify all of our services via the service details of the DVB MPEG2/4 identification fields in the meta data which is visible to all modern satellite IRDs.

This current plan for CID via modulators is being pushed by hardware manufacturers which stand to gain a major windfall due to the need for expensive hardware replacement. Conservatively at \$10,000 per unit. Coastal Media Group would have to spend about \$100,000 to comply with this order. The independent

transportable truck fleet in the US which conservatively numbers about 250 units would be spending \$5,000,000. If you add in the network and local TV stations satellite trucks there are about 1000 of them. That is over \$25 million in unnecessary expense.

Coastal Media Group trains our staff extensively. During routine satellite access, we are in telephonic communication with the NOC of the satellite carrier. They provide the work order number provided and their name and telephone number. In case of an anomaly, the NOC can call them with specific instructions. Our transmitting equipment is always manned when in operation and can react at a moments notice to follow the NOC's order(s).

Unidentified interference is a serious issue. However, interference in the majority of cases caused is not caused by transportable earth stations, but by those that are unattended including VSAT terminals and unattended and remotely controlled ground stations. There have been quite a few instances of interference being generated by these entities over the past several years but this order does not address them.

Newtec ([www.newteec.eu](http://www.newteec.eu)) has been a major force in proposing hardware based CID. Newtec as well as others stand to gain a \$25,000,000 or more windfall off the backs of small business operators like Coastal Media Group.

I urge you to reconsider implementing Section 25.281(b) or modifying it to exclude manned temporary-fixed earth stations via hardware purchases as it is not necessary. This sector of users has not caused any major interference issues that could be reduced by replacing hardware at enormous expense. As stated earlier, CID via meta data in the transport streams could resolve this issue today at near zero cost.

Thank you for your consideration.

Sincerely,



Robert D. Adler  
CEO  
Coastal Satellite, Inc, DBA Coastal Media Group Inc.